

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA            )  
  )  
  )           Criminal No. 01-455-A  
  )  
ZACARIAS MOUSSAOUI                 )

**MOTION TO PHOTOGRAPH DEFENDANT’S CELL AND ADJOINING WORKROOM**<sup>1</sup>

The condition of the defendant’s cell and his adjoining workroom is an issue in this case. See e.g., Motion to Get a Bigger Cave to Prepare the WTC (World Top Circus) (filed Aug. 19, 2002, under seal); Motion to Expulse the United States from the Arabian Discovery Cave (filed Aug. 27, 2002, under seal); Standby Counsel’s Response in Support of *Pro Se* Defendant Moussaoui’s “Motion to Get Time Out Added in the Dirty Game of U.S.” and “Motion to Get a Bigger Cave to Prepare the WTC (World Top Circus)” (filed Sept. 19, 2002, under seal). To preserve a record of the actual conditions under which Mr. Moussaoui is being confined and preparing for trial, standby counsel move the Court for an order allowing a representative of the Office of the Federal Public Defender to photograph and videotape the defendant’s cell and adjoining workroom.<sup>2</sup> For the Court’s convenience, a proposed order is attached.

Accordingly, standby counsel respectfully request that the Court grant this Motion and authorize them to photograph and videotape Mr. Moussaoui’s cell and adjoining work room.

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<sup>1</sup> Pursuant to the Court’s August 22, 2002 order, a copy of this motion was provided to Mr. Moussaoui for his review before the motion was filed.

<sup>2</sup> Counsel have requested permission from the Alexandria Detention Center to photograph Mr. Moussaoui’s work space and have been informed that a court order is required granting permission to do so.

Respectfully submitted,

ZACARIAS MOUSSAOUI  
By Standby Counsel

\_\_\_\_\_/S/  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion to Photograph Defendant's Cell and Adjoining Workroom was served upon AUSA Robert A. Spencer, AUSA David Novak and AUSA Kenneth Karas, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, VA 22314, by placing a copy BY HAND in the box designated for the United States Attorney's Office in the Clerk's Office of the U.S. District Court for the Eastern District of Virginia and UPON APPROVAL FROM THE COURT SECURITY OFFICER via first class mail to Zacarias Moussaoui, c/o Alexandria Detention Center, 2001 Mill Road, Alexandria, VA 22314 this 30<sup>th</sup> day of September 2002.

\_\_\_\_\_  
Kenneth P. Troccoli

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UNITED STATES OF AMERICA            )  
  )  
  )       Criminal No. 01-455-A  
  )  
v.    )  
  )  
ZACARIAS MOUSSAOUI                 )

**ORDER**

Upon consideration of standby counsel’s Motion to Photograph Defendant’s Cell and Adjoining Workroom, and finding good cause therefor, it is hereby

ORDERED that said Motion is Granted; and further

ORDERED that a representative of the Office of the Federal Public Defender shall be and hereby is permitted to photograph and videotape the defendant’s cell and adjoining workroom.

The Clerk is directed to forward a copy of this Order to the defendant, *pro se*; and standby counsel.

Entered this \_\_\_\_ day of October, 2002.

\_\_\_\_\_  
Leonie M. Brinkema  
United States District Judge

Alexandria, Virginia